

MEMORANDUM ENDORSED

June 1, 2022

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VIA ECF

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *Owen et al., v. Elastos Foundation, et al.*, No. 1:19-cv-5462 (GHW)

Dear Judge Woods:

Plaintiffs Mark Owen and James Wandling (“Plaintiffs”) and Defendants Elastos Foundation, Feng Han, and Rong Chen (the “Defendants”) jointly submit this letter pursuant to Your Honor’s instruction at the May 26, 2022 conference concerning the application of Chinese law to document discovery in this matter.

Following the conference, the Parties were unable to reach a stipulation on the nature, extent, and effects of Chinese law and its impact here. Accordingly, the Parties propose the following modified briefing schedule to permit the Parties to present the relevant information to the Court regarding the nature and extent of and effect of foreign law in connection with Plaintiffs’ motion to compel:

- Plaintiffs will file their motion to compel by June 13, 2022.
- Defendants will file their opposition by July 8, 2022.
- Plaintiffs will file their reply by July 22, 2022.

Respectfully submitted,

/s/ Javier Bleichmar
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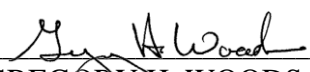
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Counsel for Defendants

Application granted. The deadline for Plaintiffs to file and serve their motion to compel is June 13, 2022. Defendants’ opposition is due no later than July 8, 2022. Plaintiffs’ reply, if any, is due no later than July 22, 2022.

SO ORDERED.

Dated: June 2, 2022
New York, New York


GREGORY H. WOODS
United States District Judge